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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Julie A. Blaser d/b/a
Wautoma Radio Company
981 Howard Street
Green Bay, WI 54303
(414) 498-3610

June 11, 1993

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, Northwest
Washington, D.C. 20054

RE: MM DOCKET NUMBNER: 93-91
RM-8197
Petition for Rulemaking
Amendment of Section 73.202(b)
FM Broadcast Stations.
(Berlin, De Forest and
Wautoma, Wisconsin)

Dear Secretary Searcy:

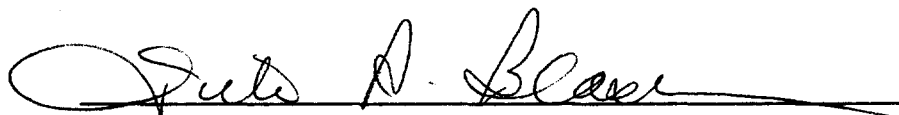
Transmitted herewith is a COUNTERPROPOSAL, a signed original and five copies, in the above captioned rulemaking proceeding.

This Counterproposal proposes amendment of 47 Code of Federal Regulations, Section 73.202(b), requesting substitution of FM Channel 226C3 for 226A at Wautoma, Wisconsin, and modification of FM Broadcast Station Construction Permit BPH-880421NZ to specify operation on Channel 226C3.

Kindly direct this correspondence for proper processing.

Thank you for your kind attention to my request.

Sincerely,



Julie A. Blaser d/b/a
Wautoma Radio Company

Petitioner

ENC: Counterproposal, Original and 5 Copies

No. of Copies rec'd
List A B C D E

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JUN 11 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARYBEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

IN THE MATTER OF:

AMENDMENT OF SECTION 73.202(B),) MM DOCKET NO: 93-91
TABLE OF ALLOTMENTS,) RM-8197
FM BROADCAST STATIONS.)
(BERLIN, DE FOREST, AND)
WAUTOMA, WISCONSIN)

TO: THE COMMISSION

COUNTERPROPOSAL

Before the Federal Communications Commission for consideration is a petition filed by De Forest Broadcasting Company ("petitioner") requesting the allotment of FM Channel 226A to De Forest, Wisconsin, as that community's first local transmission Service.

The Petitioner provided an engineering study in support of the proposal and indicated it would apply for the channel, if allotted.

The Commission by NOTICE OF PROPOSED RULE MAKING, Adopted: March 25, 1993; Released: April 28, 1993 stated: "We believe the public interest would be served by proposing the allotment of Channel 226A to De Forest, Wisconsin, since it could provide the community with its first local transmission service. Accordingly, we seek comments on the proposed amendment of the FM Table of Allotments, Section

73.202(b) of the Commission's Rules, for the communities listed below:"

	Channel No.	
City	Present	Proposed
Berlin, Wisconsin	272A	284A
De Forest, Wisconsin	--	226A
Wautoma, Wisconsin	226A	272A

Julie A. Blaser d/b/a Wautoma Radio Company ("WRC") hereby advances the following COUNTERPROPOSAL in MM Docket Number: 93-91; Rule Making 8197, for the communities listed below.

	Channel No.	
City	Present	Proposed
Berlin, Wisconsin	272A	272A
De Forest, Wisconsin	None	None
Wautoma, Wisconsin	226A	226C3

By this Counterproposal, Wautoma Radio Company proposes the Commission amend the FM Table of Allotments, 47 Code of Federal Regulations, Section 73.202(b), to substitute FM Channel 226C3 for Channel 226A at Wautoma, Wisconsin, and modify FM Broadcast Station Construction Permit BPH-880421NZ, authorizing operation of NEW(FM) at Wautoma, on Channel 226C3 in lieu of the petitioners proposed allotment of Channel 226A to De Forest, Wisconsin.

In support of this Counterproposal, Wautoma Radio Company respectfully submits the Engineering Statement prepared by Lyle Robert Evans, Technical Consultant, attached hereto as Appendix 1.

Inasmuch as Wautoma, Wisconsin (population 1,797; per 1990 Census), would be provided with a wide coverage FM station, Wautoma Radio Company concludes its Counterproposal in the public interest.

If the Commission goes forward to allot FM Channel 226C3 to Wautoma, as proposed, Wautoma Radio Company shall immediately file an Application For Construction Permit For Commercial Broadcast Station (FCC Form 301) to specify facilities for an operation on Channel 226C3 as allotted at Wautoma, Wisconsin.

Upon the Commission grant of such an Application, Wautoma Radio Company shall promptly construct, license and operate the permitted facility.

To allot Channel 226C3 to Wautoma, Wisconsin, F.W.K. Broadcasting Company, Permittee of Station KFKQ(FM), New Holstein, Wisconsin. FCC File Number: RMPH-921001TG.

channel allotment acknowledges its responsibility to reimburse the affected Station KFKQ for costs incurred in changing transmitter site-antenna tower location, and hereby makes such a commitment.

In accord with 47 Code of Federal Regulations, Section 1.52; I, Julie A. Blaser d/b/a Wautoma Radio Company, hereby certify I have read this entire document, that to the best of my knowledge, information and belief it is true and correct, that there is good ground to support it; and that is not interposed for delay.

THIS PORTION OF THIS PAGE INTENTIONALLY BLANK.

Respectfully submitted,

WAUTOMA RADIO COMPANY

June 11, 1993

A handwritten signature in cursive script, appearing to read "Julie A. Blaser", written over a horizontal line.

Julie A. Blaser, Sole Proprietor
Wautoma Radio Company
Permittee for NEW(FM)
Wautoma, Wisconsin

Julie A. Blaser d/b/a
Wautoma Radio Company
981 Howard Street
Green Bay, WI 54303

Frederick W. Kinlow d/b/a
F.W.K. Broadcasting Company
W-228, S-6825 Highway F
Waukesha, Wisconsin 53168

June 10, 1993

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, Northwest
Washington, D.C. 20554

RE: KFKQ(FM)
BMPH-921001IG
MM Docket No. 93-91

CONSENT LETTER

Dear Secretary Searcy:

I have been contacted by Wautoma Radio Company, Permittee of a new FM Radio Broadcast Station operating on Channel 226A at Wautoma, Wisconsin, and asked to accommodate their Counterproposal in MM Docket Number 93-91, requesting reclassification of Channel 226A to Channel 226C3 at Wautoma.

To effect this reclassification Station KFKQ, New Holstein, WI, must relocate its antenna to a point approximately 12 kilometers East of the currently authorized site.

Let the record show F.W.K. Broadcasting, Permittee of Station KFKQ(FM), is willing to consent to a relocation of its transmitter site to accommodate the Wautoma Channel 226C3 proposal. It is understood this may require Station KFKQ to seek authorization pursuant to 47 C.F.R., Section 73.215.

It shall complete construction of Station KFKQ(FM) at the current authorized location, and relocate upon request from Wautoma Radio Company.

All reasonable expense relating to relocation of Station KFKQ(FM) shall be the obligation of Wautoma Radio Company, and shall be a condition of such a relocation by F.W.K. Broadcasting Company.

Sincerely,



Frederick W. Kinlow,
Sole Proprietor
F.W.K. Broadcasting Company
Station KFKQ(FM)

APPENDIX 1

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

ENGINEERING STATEMENT

IN THE MATTER OF:

)

AMENDMENT OF SECTION 73.202(B),)
TABLE OF ALLOTMENTS,)
FM BROADCAST STATIONS,)
(BERLIN, DE FOREST AND)
WAUTOMA, WISCONSIN)

MM DOC. 93-91
RM-8197

TO: THE COMMISSION

PREPARED FOR:

JULIE A. BLASER D/B/A
WAUTOMA RADIO COMPANY

JUNE 11'TH, 1993

PREPARED BY:

LYLE ROBERT EVANS
BROADCAST CONSULTANT
1391 NORTH ROAD
GREEN BAY, WISCONSIN 54313
(414) 494-2626

PETITIONER: Julie A. Blaser d/b/a
Wautoma Radio Company
Channel 226C3; Wautoma, WI

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Prepared 06/11/93

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1. AFFIDAVIT OF PREPARER
2. ENGINEERING STATEMENT; Pages 1 thru 5
3. ATTACHMENT E-A; CHANNEL 226C3 DISTANCE SEPARATION STUDY,
NEW(FM) Wautoma Authorized Coordinates.
4. ATTACHMENT E-B; CHANNEL 226C3 DISTANCE SEPARATION STUDY,
Proposed Illustrative Site Coordinates.
5. ATTACHMENT E-C; F.W.K. BROADCASTING COMPANY CONSENT LETTER
Station KFKQ(FM) Antenna/Tower Location Move

TABLE OF CONTENTS; CONCLUDED

STATE OF WISCONSIN)

COUNTY OF BROWN)

CITY OF GREEN BAY)

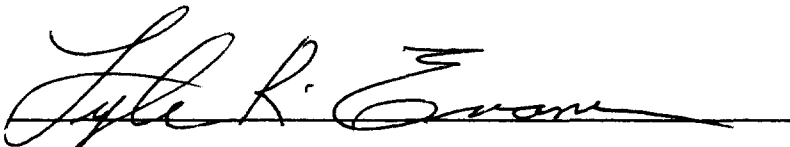
LYLE ROBERT EVANS, BEING FIRST DULY SWORN STATES:

THAT HE IS A ELECTRONIC COMMUNICATIONS CONSULTANT WITH
OFFICES AT 1391 NORTH ROAD, GREEN BAY, WISCONSIN, 54313.

THAT HIS QUALIFICATIONS ARE A MATTER OF RECORD BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION IN WASHINGTON, D.C.

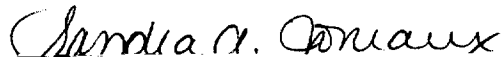
THAT HE HAS PREPARED NUMEROUS AM, FM, MICROWAVE RADIO,
TELEVISION AND TRANSLATOR APPLICATIONS WHICH HAVE BEEN
PROCESSED TO GRANT BY THE FEDERAL COMMUNICATIONS COMMISSION.

THAT ALL CALCULATIONS AND/OR MEASUREMENTS AND EXHIBITS
IN THE ACCOMPANYING REPORT WERE MADE BY HIM PERSONALLY OR
UNDER HIS DIRECTION, AND THAT ALL FACTS CONTAINED HEREIN
ARE TRUE OF HIS PERSONAL KNOWLEDGE OR BELIEF, AND ON SUCH
STATEMENTS MADE ON BELIEF, THEY ARE BELIEVED TO BE TRUE.



AFFIANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS 11'TH DAY OF JUNE,
1993.



BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

IN THE MATTER OF:)
AMENDMENT OF SECTION 73.202(B),) MM DOCKET NO: 93-91
TABLE OF ALLOTMENTS,) RM-8197
FM BROADCAST STATIONS.)
(BERLIN, DE FOREST, AND)
WAUTOMA, WISCONSIN)
TO: THE COMMISSION

ENGINEERING STATEMENT

This Engineering Statement concerns the above captioned COUNTERPROPOSAL to a Petition For Rule Making; MM Docket Number: 93-91; RM-8197, to which this Engineering Statement is Appendix 1.

Wautoma Radio Company ("WRC"), the entity advancing said Counterproposal, retained the services of Lyle Robert Evans, Broadcast Consultant, to conduct engineering studies and prepare necessary Statements and Attachments to support the Counterproposal of Wautoma Radio Company, to amend Section 73.202(b) of the Commission's Rules and Regulations. to substitute FM Channel 226C3 for

De Forest, Wisconsin

The Commission by NOTICE OF PROPOSED RULE MAKING,

Adopted: March 25, 1993: Released: April 28, 1993 stated:

By this Counterproposal, Wautoma Radio Company proposes the Commission amend the FM Table of Allotments, 47 Code of Federal Regulations, Section 73.202(b), to substitute FM Channel 226C3 for Channel 226A at Wautoma, Wisconsin, and modify FM Broadcast Station Construction Permit BPH-880421NZ, authorizing operation of NEW(FM) at Wautoma, on Channel 226C3.

This Counterproposal is mutually exclusive with with the allotment of Channel 226A to De Forest, Wisconsin, proposed by the Commission in the referenced NOTICE.

Geographic Coordinates of the permitted antenna/tower location of NEW(FM) at Wautoma, Wisconsin are: 44°-04'-06" North Latitude, 88°-19'-38" West Longitude. Attachment E-A to this Statement is a FM Channel 226C3 Distance Separation Study with these permitted coordinates as base.

Attachment E-A displays allotment of FM Channel 226C3 at the NEW(FM) antenna Coordinates "Short-Spaced" to several relating assignments, such short-spacing in contravention with Minimum Distance Separation Requirements

location of a Channel 226C3 operation approximately twelve kilometers Southeast of the City of Wautoma, Wisconsin Reference Coordinates. In addition, the antenna/tower of Station KFKQ(FM), New Holstein, Wisconsin, must be relocated approximately twelve kilometers East of its authorized coordinates.

F.W.K. Broadcasting Company, Permittee of Station KFKQ(FM) has agreed accommodate the allotment of Channel 226C3 to Wautoma, Wisconsin, by relocation of the Station KFKQ(FM) antenna/tower. (See Consent Letter, attached.)

A restricted antenna/tower location for an operation on Channel 226C3 at Wautoma, consistent with Commission minimum distance separation requirements between FM radio broadcast stations, set forth in 47 Code of Federal Regulations, Section 73.207, has been determined.

This illustrative antenna/tower location is 11.93 kilometers distant, at a bearing of 139.3 degrees True from the Wautoma, Wisconsin, Reference Coordinates.

Attachment E-B to this Statement, a FM Channel 284A Distance Separation Study with the restricted illustrative antenna coordinates: 43°-59'-25" North Latitude, 89°-11'-40" West Longitude, as base, evidences this illustrative site in complete compliance with all Commission minimum distance separation requirements for FM radio broadcast stations, upon relocation of the Station

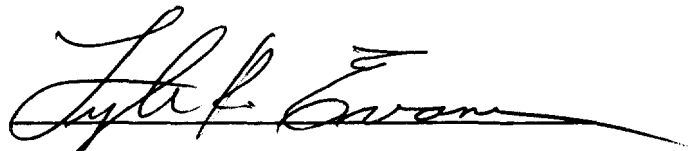
KFKQ(FM) antenna/tower.

A typical Class C3 operation (25.00 kW E.R.P., 100.0 meter H.A.A.T.) at this illustrative site shall provide the requisite 70.0 dBu (3.16 mV/m), "City-Grade" signal to all Wautoma.

The geographic coordinates of the most distant point on the Wautoma corporate bondary ("City-Limits") have been determined as: 44°-04'-51" North Latitude, 89°-18'-14" West Longitude. Distance from the proposed Wautoma NEW(FM) illustrative antenna/tower location to this most distant point of Wautoma is 13.34 kilometers at a bearing of 318.9 degrees True.

The Counterproposal to which this Statement is Appendix 1, shall provide a vastly improved first local aural (FM) broadcast service to Wautoma, Wisconsin and vicinity, fully consistent with all Commission Rules and Regulations.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Lyle Robert Evans", with a long horizontal flourish extending to the right.

Lyle Robert Evans,
Technical Consultant to:
Wautoma Radio Company

June 11, 1993

ENGINEERING STATEMENT; CONCLUDED

FM CHANNEL 226C3 DISTANCE SEPARATION STUDY

LOCATION: WAUTOMA, WISCONSIN
SERVICE: COMMERCIAL F.M.
CHANNEL: 226
FREQUENCY: 93.1 MEGAHERTZ
ZONE: II
CLASS: C3
COORDINATES: 44°-04'-06" N.L., 89°-19'-38" W.L. (BPH-880421NZ COORDINATES)
PETITIONER WAUTOMA RADIO COMPANY
DATE: JUNE 11'TH, 1993

CALL STATUS	CITY STATE	FCC FILE	CHAN. ZONE	ERP(KW) HAAT(M)	LATITUDE LONGITUDE	BEAR. (DEG.)	DIST. (KM.)	REQ. (KM.)
WBWI	WEST BEND		223B	19.50	43-25-45	130.6	109.10	71.0
LIC	WI	BLH-831212AK	92.5	158.00	88-17-53		38.10	CLEAR
WDUX-FM	WAUPACA		224A	6.00	44-21-14	33.7	38.13	42.0
LIC	WI	BLH-910314KC	95.7	74.20	89-03-44		-3.87	SHORT
KFKQ	NEW HOLSTEIN		225A	6.00	44-02-37	91.8	88.21	89.0
CP	WI	BMPH-921001IG	92.9	100.00	88-13-34		-0.79	SHORT

FM CHANNEL 226C3 DISTANCE SEPARATION STUDY

LOCATION: WAUTOMA, WISCONSIN
 SERVICE: COMMERCIAL F.M.
 CHANNEL: 226
 FREQUENCY: 93.1 MEGAHERTZ
 ZONE: II
 CLASS: C3
 COORDINATES: 44°-04'-06" N.L., 89°-19'-38" W.L. (BPH-880421NZ COORDINATES)
 PETITIONER WAUTOMA RADIO COMPANY
 DATE: JUNE 11'TH, 1993

CALL STATUS	CITY STATE	FCC FILE	CHAN. ZONE	ERP(KW) HAAT(M)	LATITUDE LONGITUDE	BEAR. (DEG.)	DIST. (KM.)	REQ. (KM.)
WOZZ LIC	NEW LONDON WI	BLH-890911KB	228C2 93.5	50.00 150.00	44-32-47 88-32-57	49.4	81.67 25.67	56.0 CLEAR
WXCE CP	NEKOOSA WI	BPH-880519OG	229A 93.7	6.00 50.00	44-16-05 89-57-35	293.7	55.21 13.21	42.0 CLEAR
WEZW LIC	WAUWATOSA WI	BLH-810605AB	279B 103.7	19.50 256.00	43-05-48 87-54-19	133.2	157.55 140.55	17.0 CLEAR
PRM	WINNECONNE WI	DOC-90-139	280C3 103.9		44-15-09 88-44-48	66.2	50.72 36.72	14.0 CLEAR

----- END FM CHANNEL 226C3 STUDY -----

NOTE: § The Counterproposal of which this Attachment E-A is part
 is mutually exclusive with this Proposed Rule Making (PRM).

ATTACHMENT E-A: CONCLUDED

FM CHANNEL 226C3 DISTANCE SEPARATION STUDY

LOCATION: WAUTOMA, WISCONSIN
 SERVICE: COMMERCIAL F.M.
 CHANNEL: 226
 FREQUENCY: 93.1 MEGAHERTZ
 ZONE: II
 CLASS: C3
 COORDINATES: 43°-59'-25" N.L., 89°-11'-40" W.L. (ILLUSTRATIVE COORDINATES)
 PETITIONER WAUTOMA RADIO COMPANY
 DATE: JUNE 11'TH, 1993

CALL STATUS	CITY STATE	FCC FILE	CHAN. ZONE	ERP(KW) HAAT(M)	LATITUDE LONGITUDE	BEAR. (DEG.)	DIST. (KM.)	REQ. (KM.)
WBWI LIC	WEST BEND WI	BLH-831212AK	223B 92.5	19.50 158.00	43-25-45 88-17-53	130.8	95.38 24.38	71.0 CLEAR
WDUX-FM LIC	WAUPACA WI	BLH-910314KC	224A 95.7	6.00 74.20	44-21-14 89-03-44	14.7	41.75 -0.25	42.0 SHORT*
KFKQ CP	NEW HOLSTEIN WI	BMPH-921001IG	225A 92.9	6.00 100.00	44-02-37 88-13-34	85.6	77.82 -11.18	89.0 SHORT#
ALLOT	BIRNAMWOOD WI	DOC-91-132	225A 92.9		44-59-04 89-18-52	355.1	110.86 21.86	89.0 CLEAR
ALLOT	WAUTOMA WI	DOC-89-548	226A 93.1		44-04-18 89-17-30	319.3	11.93 -130.07	142.0 SHORT
NEW CP	WAUTOMA WI	BPH-880421NZ	226A 93.1	6.00 4.00	44-04-06 89-19-38	309.2	13.72 -128.28	142.0 SHORT
PRM	DE FOREST		226A		43-16-08	188.1	80.94	142.0

FM CHANNEL 226C3 DISTANCE SEPARATION STUDY

LOCATION: WAUTOMA, WISCONSIN
 SERVICE: COMMERCIAL F.M.
 CHANNEL: 226
 FREQUENCY: 93.1 MEGAHERTZ
 ZONE: II
 CLASS: C3
 COORDINATES: 43°-59'-25" N.L., 89°-11'-40" W.L. (ILLUSTRATIVE COORDINATES)
 PETITIONER WAUTOMA RADIO COMPANY
 DATE: JUNE 11'TH, 1993

CALL STATUS	CITY STATE	FCC FILE	CHAN. ZONE	ERP(KW) HAAT(M)	LATITUDE LONGITUDE	BEAR. (DEG.)	DIST. (KM.)	REQ. (KM.)
WOZZ LIC	NEW LONDON WI	BLH-890911KB	228C2 93.5	50.00 150.00	44-32-47 88-32-57	39.8	80.42 24.42	56.0 CLEAR
WXCE CP	NEKOOSA WI	BPH-880519OG	229A 93.7	6.00 50.00	44-16-05 89-57-35	296.8	68.54 26.54	42.0 CLEAR
WEZW LIC	WAUWATOSA WI	BLH-810605AB	279B 103.7	19.50 256.00	43-05-48 87-54-19	133.6	143.85 126.85	17.0 CLEAR
PRM	WINNECONNE WI	DOC-90-139	280C3 103.9		44-15-09 88-44-48	50.9	46.17 32.17	14.0 CLEAR

----- END FM CHANNEL 226C3 STUDY -----

NOTE: § The Counterproposal of which this Attachment E-B is part
 is mutually exclusive with this Proposed Rule Making (PRM).

 * Those assignments, applications and allotments whose
 indicated separation status is followed by an asterisk
 (*) while "short-spaced" comply with applicable minimum
 distance separation requirements by utilization of "5/4"
 rounding.

 # This short-spacing is removed by the accommodation of
 F.W.K. Broadcasting in moving the Station KFKQ(FM)
 antenna/tower location.

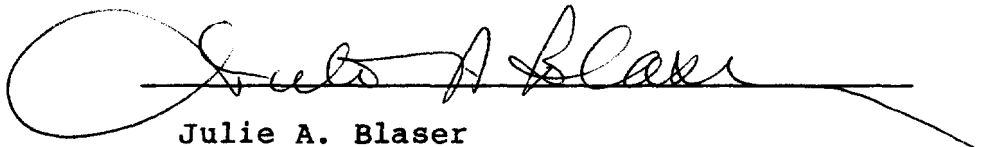
ATTACHMENT E-B; CONCLUDED

CERTIFICATE OF SERVICE

I, JULIE A. BLASER, hereby certify; on the 11'th day of June, 1993, I deposited a copy of the attached COUNTERPROPOSAL in the United States mail at Green Bay, Wisconsin, in a sealed envelope, first class mail, postage prepaid, addressed to:

MR. Richard J. Hayes, Jr.
13809 Black Meadow Road
Greenwood Plantation
Spotsylvania, Virginia 22553

Kingsley H. Murphy, Jr.
Station WISS-FM
207 Textile Building
119 North 4th Street
Minneapolis, Minnesota 55401



Julie A. Blaser

Julie A. Blaser d/b/a
Wautoma Radio Company
981 Howard Street
Green Bay, WI 54303
(414) 498-3610

June 11, 1993

CERTIFICATE OF SERVICE; CONCLUDED